

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

ANDREEA IACOBETI

Plaintiff,

v.

GENNA LEIGH ROSE WEEKS

Defendant.

Case Number: 1:23-CV-1758

**DEFENDANT GENNA WEEKS' ANSWER TO PLAINTIFF'S
COMPLAINT FOR MONEY DAMAGES**

COMES NOW the Defendant, Genna Leigh Rose Weeks, by and through her attorneys, Budow and Noble, P.C., Anne K. Howard, Esq., and David H. Fleishman, Esq., and answers the Complaint for Money Damages filed against her by Plaintiff, Andreea Iacobeti, as follows:

FIRST DEFENSE

The Complaint fails to state a cause of action upon which relief can be granted against Defendant Weeks.

SECOND DEFENSE

Defendant Weeks denies liability generally as to both the facts and the damages.

THIRD DEFENSE

In answer to the specifically enumerated paragraphs of the Complaint, by like paragraphs, Defendant Weeks avers:

1. Defendant is without information sufficient to either admit or deny the allegations contained in this paragraph and therefore denies same.

2. Admitted.

3. Admitted.

4. Admitted.

5. Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

11. Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

12. Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

13. Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

14. Admitted.

15. Denied.

16. Denied as stated.

17. The allegations in this paragraph call for a medical conclusion and Defendant is not a doctor. Further, Defendant is without sufficient knowledge to admit or deny the allegations contained in this paragraph and therefore denies same.

18. Defendant Weeks incorporates and adopts the above response to the allegations referenced in Paragraph 17 as if fully set forth herein.

19. Defendant Weeks incorporates and adopts the above response to the allegations referenced in Paragraph 17 as if fully set forth herein.

20. Denied as stated.

21. The allegations in paragraph 21 consist of legal conclusions to which no response is required. To the extent that a response is required, the allegations are denied.

23. Denied.

24. Denied.

25. The allegations in paragraph 10 consist of legal conclusions to which no response is required. To the extent that a response is required, the allegations are denied.

26. Denied.

27. The allegations in paragraph 10 consist of legal conclusions to which no response is required. To the extent that a response is required, the allegations are denied.

28. Defendant is without information sufficient to either admit or deny the allegations contained in this paragraph and therefore denies same.

FOURTH DEFENSE

Defendant raises the affirmative defense of assumption of risk.

FIFTH DEFENSE

Defendant raises the affirmative defense of contributory negligence.

SIXTH DEFENSE

Defendant raises the defense of waiver and estoppel.

SEVENTH DEFENSE

Subject to further investigation, Defendant Weeks raises the negative and/or affirmative and/or other defenses of release, bar by the statute limitations, lack of actual injury, lack of causation, failure to mitigate damages, *res judicata*, and immunity.

WHEREFORE, Defendant, Genna Leigh Rose Weeks, having fully answered the Complaint, respectfully requests that Plaintiff's Complaint be dismissed with prejudice or that judgment be entered in his favor along with other relief, including attorneys' fees and costs, as this Court deems proper.

Respectfully submitted,

BUDOW AND NOBLE, P.C.

/s/

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Genna Leigh Rose Weeks

DEMAND FOR JURY TRIAL

The Defendant Genna Leigh Rose Weeks hereby elects a trial by jury on all issues herein.

/s/

Anne K. Howard, Esquire, Bar No.: 04729
David H. Fleishman, Esquire, Bar No.: 30607

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of July 2023, the foregoing Defendant Genna Weeks' Answer to Plaintiff's Complaint for Money Damages was e-filed and e-served to the following:

William C. Hudson, Esquire
Law Office of William C. Hudson
9748 Stephen Decatur Highway, Suite 111
Ocean City, Maryland 21842
Attorney for Plaintiff,
Andreea Iacobeti

/s/

Anne K. Howard, Esquire, Bar No.: 04729
David H. Fleishman, Esquire, Bar No.: 30607